

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE

In Re:

Jeffery Wayne Lovell  
Tiffany Nicole Lovell  
Debtors

BK: 24-01377-CW1-13

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Response to: Trustee's Motion to Dismiss Case for Failure to Fund Plan  
Response Deadline: March 24, 2025  
Hearing Date: April 16, 2025  
Time and Location: 9:30 a.m. Joint Hearing Courtroom (COL); (Virtual hearing if allowed; see website for details); 701 Broadway, Nashville, TN 37203.

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**RESPONSE TO TRUSTEE'S MOTION TO DISMISS CASE FOR  
FAILURE TO FUND PLAN**

Comes the Debtor, through counsel and would respond to the Trustee Motion to Dismiss Case for Failure to Fund Plan as follows:

1. The debtors did not realize the length of time for the payment to receipt with the Trustee following the "TFS" draft date. The Debtors will be correcting the TFS to make sure all payments will be receipted for the month
2. The case will be on probation providing that, if future payments are missed, the case will be dismissed upon application and order entered with the Court.
3. The debtor will attend the Chapter 13 Trustee's Financial Workshop within 60 days of entry of this order

BASED UPON THE FOREGOING, the Debtor requests the Court to deny the Trustee Motion to Dismiss Case for Failure to Fund Plan.

Respectfully submitted March 21, 2025.

/s/ Keith D. Slocum

Keith D. Slocum - BPR No. 023024

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